Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended By the Cable Television Consumer Protection and Competition Act of 1992)))	MB Docket No. 05-311

December 14, 2018

Comments of Hawai'i Public Television Foundation (PBS Hawai'i)

To the Honorable FCC Chair Ajit V. Pai and fellow Commissioners:

Hawai`i Public Television Foundation, located in Honolulu, Hawai`i and serving the entire state of Hawai`i as PBS Hawai`i, wishes to register its support of the State of Hawai`i's opposition to the Commission's Second Further Notice of Rulemaking on regulation of the local cable television franchising process.

The State of Hawai`i, as Local Franchising Authority, directs a portion of cable franchise fee proceeds to our nonprofit educational organization. We are a federally licensed educational broadcaster and a PBS community licensee in the most ethnically diverse state in the Union and the most remote archipelago in the world.

In a local media environment of commercial consolidation and less and less meaningful local news coverage, this Foundation provides weekly local programming in public affairs, live town halls, documentaries by Pacific filmmakers, in-depth interviews with Hawai`i/Pacific guests and music/cultural events and developments. We believe in presenting different perspectives in a trusted space to aid viewers in understanding a complex and changing world.

We also provide respected PBS, BBC, and NHK-World (Japan) with lifelong learning at its core, to viewers of all ages. In this island state with a high cost of living and a largely service (tourism) economy, an estimated 42 per cent of Hawai`i's toddlers do not attend preschool. We essentially are the state's largest preschool, providing on two cable channels a combined 34 hours of daily children's programs, solidly based on curriculum.

The stabilizing influence of franchise fee funding has allowed us to attract meaningful private funding for innovation. Among other outcomes, this has resulted in eight years of Hawai`i's first statewide teacher training in 21^{st} -century skills, including digital storytelling. We developed and provided free curricula to all interested middle and high schools in the state. The teacher training, through our HIKI N $\bar{\text{O}}$ (Hawaiian language for "can do") Statewide Student News Network of 90 middle and high schools, has resulted in agile

digital students who have been winning a disproportionately high 20 per cent of the awards in rigorous national student journalism competitions.

Another signature program of this Foundation, KĀKOU — Hawai`i's Town Hall, brings together people of different perspectives and backgrounds on live television, for discussions of significant public issues that are frank and sometimes pointed, while remaining respectful. The program models civil discourse in approaching tough discussions, and there have been "aha" breakthrough moments between adversaries at these Town Halls. The name of the series, KĀKOU, means "all of us" in the Hawaiian language.

For 53 years, we have been a unifying force in the Hawaiian Islands, upholding PBS national standards in fairness and accuracy and providing local coverage as Hawai`i's only locally owned statewide broadcaster.

With its direction of cable franchise fees, the State of Hawai`i (LFA) provides important funding that attracts private funding and key learning resources for the benefit of the people of Hawai`i. The loss of this cable funding would be profoundly destructive to the public interest.

Hawaii Public Television Foundation, dba PBS Hawai`i, opposes the Commission's proposed rules and proposed conclusions in the FNPRM.

Thank you for this opportunity to enter our comments in this matter of great significance to our state.

Sincerely,

Jason Fujimoto

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Chair, Board of Directors

Hawai`i Public Television Foundation

(PBS Hawai`i)

Leslie Wilcox

President and CEO

Leslie Wilcox

Hawai`i Public Television Foundation

(PBS Hawai`i)

Cc: The Honorable Michael O'Rielly, Commissioner

The Honorable Brendan Carr, Commissioner

The Honorable Jessica Rosenworcel, Commissioner

U.S. Senator Brain Schatz

U.S. Senator Mazie Hirono

U.S. Representative Tulsi Gabbard

Governor David Ige, State of Hawaii

Catherine Awakuni Cólon, Director, Hawaii State Dept. of Commerce and Consumer Affairs